



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

March 21, 2002

Via Overnight Mail

Philip A. Odeen
Non-Executive Chairman
TRW, Inc.
1900 Richmond Road
Cleveland, OH 44124

Re: Administrative Order Docket No. 2002-06
Puente Valley Operable Unit, San Gabriel Valley Superfund Sites

Dear Mr. Odeen:

Please find enclosed U.S. Environmental Protection Agency ("EPA"), Region IX, Administrative Order Docket No. 2002-06, issued to TRW, Inc. ("TRW") on March 21, 2002. The Order takes effect on Tuesday, March 26, 2002 and requires TRW to perform the intermediate groundwater zone remedial design and remedial action ("RD/RA") for the Puente Valley Operable Unit ("PVOU") of the San Gabriel Valley Superfund Sites. Pursuant to Paragraph 58 of the Order, TRW must provide by facsimile a written notice of its intent to comply with the Order by Friday, March 29, 2002.

As we have discussed with Robert Walter, and Chris Volz previously, this Order is intended to ensure that the RD/RA for the PVOU proceeds in a timely manner. EPA still expects to negotiate and enter into a consent decree with TRW and the other members of the Puente Valley Steering Committee. In the event that this does not happen, this Administrative Order will remain in effect, although EPA may amend it or take other enforcement action as necessary to ensure that all appropriate responsible parties are contributing to CERCLA response actions at the PVOU.

Please contact Brett Moffatt of our Office of Regional Counsel at (415) 972-3946 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Penelope McDaniel", written over a horizontal line.

Penelope McDaniel
Remedial Project Manager

Enclosures

cc: Robert Walter, TRW, Inc. (by facsimile & mail)
Chris Volz, McKenna & Cuneo (by facsimile & mail)
Elizabeth Kroop, U.S. DOJ (by facsimile & mail)

75 Hawthorne Street
San Francisco, California 94105

Proceeding Under Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9606(a)

[illegible]

TABLE OF CONTENTS

I.	INTRODUCTION AND JURISDICTION	1
II.	FINDINGS OF FACT	1
III.	CONCLUSIONS OF LAW AND DETERMINATIONS	9
IV.	NOTICE TO THE STATE	10
V.	ORDER	10
VI.	DEFINITIONS	10
VII.	NOTICE OF INTENT TO COMPLY	12
VIII.	PARTIES BOUND	13
IX.	WORK TO BE PERFORMED	13
X.	FAILURE TO ATTAIN PERFORMANCE STANDARDS	18
XI.	EPA PERIODIC REVIEW	19
XII.	ADDITIONAL RESPONSE ACTIONS	19
XIII.	ENDANGERMENT AND EMERGENCY RESPONSE	20
XIV.	EPA REVIEW OF SUBMISSIONS	20
XV.	PROGRESS REPORTS	21
XVI.	QUALITY ASSURANCE, SAMPLING AND DATA ANALYSIS	21
XVII.	COMPLIANCE WITH APPLICABLE LAWS	22
XVIII.	EPA PROJECT MANAGER	22
XIX.	ACCESS TO SITE NOT OWNED BY RESPONDENT	24
XX.	SITE ACCESS AND DATA/DOCUMENT AVAILABILITY	24
XXI.	RECORD PRESERVATION	25

XXII. DELAY IN PERFORMANCE	26
XXIII. ASSURANCE OF ABILITY TO COMPLETE WORK	26
XXIV. REIMBURSEMENT OF RESPONSE COSTS	27
XXV. UNITED STATES NOT LIABLE	27
XXVI. ENFORCEMENT AND RESERVATIONS	27
XXVII. ADMINISTRATIVE RECORD	28
XXVIII. EFFECTIVE DATE AND COMPUTATION OF TIME	29
XXIX. OPPORTUNITY TO CONFER	29

ATTACHMENTS

Attachment 1 Puente Valley Operable Unit Interim Record of Decision

Attachment 2 Maps of former TRW, Inc. Facilities, Industry, California

Attachment 3 Statement of Work for Administrative Order 2002-06

I. INTRODUCTION AND JURISDICTION

1. This Order directs the Respondent, TRW, Inc. ("TRW" or "Respondent") to perform the interim remedial design and remedial action for the intermediate groundwater zone at the mouth of Puente Valley as described in the Interim Record of Decision ("ROD") for the Puente Valley Operable Unit of the San Gabriel Valley Superfund Sites, dated September 30, 1998. This Order is issued to Respondent by the United States Environmental Protection Agency ("EPA") under the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9606(a). This authority was delegated to the Administrator of EPA on January 23, 1987, by Executive Order 12580 (52 Fed. Reg. 2926, January 29, 1987), and was further delegated to EPA Regional Administrators on September 13, 1987 by EPA Delegation No. 14-14-B. This authority was further delegated to the Chief of the Superfund Site Cleanup Branch, EPA Region 9, by Regional Order R9-1290.14(a), dated November 16, 2001.

II. FINDINGS OF FACT

Site Background

2. In May of 1984, pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, EPA placed the San Gabriel Valley Superfund Sites, Areas 1-4, on the National Priorities List, set forth in 40 C.F.R. Part 300, Appendix B (49 Fed. Reg. 40320).
3. To study and undertake response activities at the San Gabriel Valley Superfund Sites, EPA divided the four San Gabriel Valley Sites into operable units, based on geography. This Order addresses a portion of the interim remedial design and remedial action for the Puente Valley Operable Unit ("PVOU" or "Site"), which is located within San Gabriel Valley Superfund Site Area 4.
4. The PVOU is located in the southeastern portion of the San Gabriel Valley in Los Angeles County, California, and encompasses an area of groundwater contamination that is over twelve miles in length and from two to three miles in width. This area of contamination underlies most of the City of Industry and portions of La Puente and is depicted generally in the ROD (Attachment 1). Groundwater within the PVOU generally flows to the west and northwest, except that at the mouth of Puente Valley, the direction of groundwater flow ranges from west to north. Most of this groundwater is extracted by water supply wells at the northwest end of the PVOU. Some of the PVOU groundwater bypasses the water supply wells and flows towards the Whittier Narrows.
5. The San Gabriel Valley groundwater basin, including groundwater from the PVOU, provides drinking water to more than one million residents of the San Gabriel Valley and other nearby areas. The rights to extract and use this groundwater have been adjudicated by the State. Only specified users, including a number of domestic water purveyors, are permitted to extract groundwater from the Site. Given the absence of dependable

alternatives to the aquifer as the region's primary water supply, the groundwater is expected to remain the residents' primary source of drinking water indefinitely.

6. The State of California considers all subsurface groundwater zones (shallow, intermediate, and deep) of relatively high permeability in the PVOU to be potential sources of drinking water.
7. The EPA, State of California, and local water producers have detected chemicals of potential concern in the PVOU groundwater, including tetrachloroethylene ("PCE"), trichloroethylene ("TCE"), 1,1,1-trichloroethylene ("1,1,1-TCA"), their degradation products, and the other volatile organic compounds ("VOCs") listed in Table 1 of the ROD. These chemicals were used at many industrial facilities in and around the City of Industry beginning in the 1950s for degreasing metal parts and other purposes. Investigations of the source facilities indicates that these chemicals were released to the ground through on-site disposal, careless handling, leaking tanks, pipes and sumps, and other means. Within the San Gabriel Valley Superfund Sites, more than one-quarter of the approximately 366 water supply wells have been found to be contaminated with one or more of these chemicals.
8. Fifty-four VOCs have been detected in the groundwater drawn from production and monitoring wells in the PVOU. (See Table 1 in Attachment 1). At least five of these VOCs are classified as known or probable human carcinogens. If groundwater contamination is not addressed, there will be a long-term potential for human exposure to VOCs. The human populations potentially exposed to VOCs present in the groundwater include individuals using the groundwater for domestic purposes.

EPA's Site Activities

9. Beginning in March 1991, EPA sent general notice letters to those entities that EPA believed to be potentially responsible for contamination at the Site. In May 1993, acting pursuant to Section 122(e) of CERCLA, 42 U.S.C. § 9622(e), EPA sent special notice letters to 58 potentially responsible parties for the Site. The special notice letters requested that the recipients enter into negotiations with EPA to perform the Remedial Investigation and Feasibility Study ("RI/FS") for the PVOU. Forty-two of the potentially responsible parties, including Respondent, formed the Puente Valley Steering Committee ("PVSC") and in September 1993 entered into an Administrative Order on Consent to perform the RI/FS.
10. From September 1993 to May 1997, the PVSC undertook the RI/FS for the PVOU. Because of the PVSC's failure to adequately address EPA comments on RI/FS deliverables, EPA took over the Feasibility Study in December 1996. In two separate reports dated May 30, 1997, the PVSC presented the results of the Remedial Investigation and EPA presented the results of the Feasibility Study, in accordance with CERCLA and the National Contingency Plan, 40 C.F.R. Part 300.

11. Pursuant to Section 117 of CERCLA, 42 U.S.C. § 9617, EPA published notice of the completion of the Feasibility Study and the proposed plan for remedial action on January 28, 1998, and provided opportunity for public comment on the proposed interim remedial action.
12. The decision by EPA on the interim remedial action to be implemented at the PVOU is embodied in the ROD, executed on September 30, 1998, on which the State of California has given its concurrence. The ROD is Attachment 1 to this Order and is incorporated by reference. The ROD is supported by an administrative record that contains the documents and information upon which EPA based the selection of the response action.
13. On September 28, 2000, EPA issued CERCLA Section 122(e) special notice letters to 56 potentially responsible parties ("PRPs") for the PVOU, including Respondent. These special notice letters requested that the PRPs make a "good faith offer" to perform the remedial design and remedial action ("RD/RA") and reimburse EPA for its past response costs. On December 4, 2000, the PVSC, including Respondent, replied with an offer to perform a portion of the RD/RA and pay a portion of EPA's past response costs. EPA subsequently engaged in settlement discussions with the PVSC.
14. Some of the PRPs for the PVOU did not make a good faith offer to perform the RD/RA or reimburse EPA's past response costs. On September 13, 2001, EPA issued Administrative Order 2001-20 to one of these PRPs, Carrier Corp., to perform the shallow groundwater portion of the RD/RA. Carrier Corp. refused to comply with Administrative Order 2001-20. Consequently, EPA has initiated the shallow groundwater portion of the RD/RA for the PVOU.
15. EPA anticipates entering into one or more consent decrees with the members of the PVSC, including Respondent. Respondent has informed EPA that if a settlement is reached, it would play a principal role in implementing the intermediate groundwater portion of the RD/RA for the PVOU. Respondent and its contractor have been engaged in detailed discussions with EPA regarding the development of the Statement of Work for the remedial design. However, settlement negotiations have been complex and time-consuming and there is an urgent need to initiate the intermediate groundwater portion of the RD/RA for the PVOU. EPA is issuing this administrative order to ensure that the RD/RA proceeds in a timely manner.

Respondent's Past Operations and Evidence of Releases

16. Respondent, its subsidiary Lucas Western, Inc., and Lucas Western's predecessors in interest, operated three manufacturing facilities at the Site, at the following locations: (1) 200 South Turnbull Canyon Road, City of Industry, California; (2) 14724 East Proctor Avenue, City of Industry, California; and (3) 18301 East Arenth Avenue, City of Industry, California (the "Facilities").
17. Pursuant to the requirements of the Los Angeles Regional Water Quality Control Board ("LARWQCB"), Respondent investigated soil matrix, soil gas and groundwater conditions

on and around the Facilities for evidence of VOC releases. Sampling at the Facilities detected TCE, PCE, 1,1,1-TCA, 1,1-dichloroethene ("1,1-DCE"), 1,1-dichloroethane ("1,1-DCA"), 1,1,2-trichloroethane ("1,1,2-TCA"), methylene chloride, and other chemicals of concern listed in Table 1 of the ROD, in the soil matrix, soil gas, and groundwater. Environmental assessments of the Facilities identified significant sources of VOC releases to the environment.

200 South Turnbull Canyon Road

18. Respondent owned and operated the 200 South Turnbull Canyon Road facility from approximately 1968 to December 30, 1983. At this facility, Respondent manufactured printed circuit boards and used PCE, TCE, 1,1,1-TCA and methylene chloride for degreasing purposes. A December 1985 inspection by the LARWQCB found two aboveground storage tanks ("ASTs") containing 1,1,1-TCA, two closed-loop solvent cleaning systems, a floor drain system in the processing areas, and poor housekeeping in the AST farm area.
19. On January 21, 1987, Respondent's contractor collected soil matrix samples from three soil borings drilled to a maximum depth of 45' below ground surface ("bgs") in several areas of concern. Laboratory analysis of these samples detected up to 1,300 µg/kg of 1,1-DCE at 20' bgs, 2,500 µg/kg of 1,1,1-TCA at 20' bgs, 460 µg/kg of 1,1-DCA at 20' bgs, and 910 µg/kg of methylene chloride at 20' bgs. Respondent's contractor collected additional soil matrix samples from 31 additional soil borings during 1987 and 1988. Laboratory analysis of these samples also detected significant VOC concentrations at depths ranging from 1' bgs to 30' bgs.
20. During January 1990, Respondent's contractor collected soil matrix samples from 16 soil borings drilled to a maximum depth of 40' bgs in several areas of concern. Laboratory analysis of these samples detected up to 75,000 µg/kg of 1,1,1-TCA at 35' bgs, 9,400 µg/kg of 1,1-DCE at 35' bgs, 11,000 µg/kg of methylene chloride at 30' bgs, 2,900 µg/kg of 1,2-dichloroethene ("1,2-DCA") at 35' bgs, 1,500 µg/kg of 1,1,2-TCA at 25' bgs, 1,500 µg/kg of TCE at 30' bgs, and 330 µg/kg of PCE at 25' bgs.
21. During January 1991, Respondent's contractor collected soil matrix samples from 45 soil borings drilled to a maximum depth of 40' bgs in several areas of concern. Laboratory analysis of these samples detected up to 28,000 µg/kg of TCE, 2,100 µg/kg of PCE, 2,300 µg/kg of 1,1,1-TCA at 4' bgs, 2,300 µg/kg of 1,1-DCA at 4' bgs, 2,000 µg/kg of 1,1-DCE at 4' bgs, 14 µg/kg of 1,1,2-TCA at 4' bgs, and 14 µg/kg of 1,2-DCA at 4' bgs. Respondent's contractor collected additional soil matrix samples from 31 additional soil borings during 1991. Laboratory analysis of these samples also detected significant VOC concentrations at depths down to 40' bgs.
22. During January and May 1987, Respondent's contractor conducted two soil gas investigations of several areas of concern at the facility. Laboratory analysis of samples collected at 4' bgs detected up to 180,000 µg/l of TCE, up to 122,000 µg/l of 1,1,1-TCA, and up to 5,600 µg/l of PCE.

23. The highest concentrations of VOCs in the soil matrix and soil gas were detected in the former solvent stripping area, degreasing area, AST farm area, underground piping runs, developer and still areas, and sump areas.
24. From January 1987 to October 1992, Respondent's contractor installed 25 groundwater monitoring wells, which were screened at 60' bgs, 80-100' bgs and 160-180' bgs. Laboratory analysis of groundwater samples from monitoring well W-3 detected up to 120,000 µg/l of 1,1,1-TCA, up to 73,000 µg/l of TCE, up to 56,000 µg/l of 1,1-DCE, , 4,700 µg/kg of 1,1-DCA, and up to 900 µg/l of PCE. Laboratory analysis of groundwater samples from monitoring well W-9 detected up to 56,000 µg/l of 1,1-DCE. The highest VOC concentrations in groundwater were detected at the northwestern corner of the property and the northern property boundary.
25. The buildings located on the 200 South Turnbull Canyon Road facility were demolished in 1990. In 1991, Respondent excavated and removed soils from areas with the most significant VOC contamination and began operating a soil vapor extraction system to clean up soils at remaining "hot spots" on the property.
26. Respondent installed a groundwater remediation system in 1995, and operated intermittently between February and December 1996, continuously from July 1998, and continuously from July 1998 to February 2000. The system was shut down on February 22, 2000 due to the detection of 1,4-dioxane in the system effluent at levels in excess of those allowed by the RWQCB. An advanced oxidation system was installed in December 2000 to treat 1,4-dioxane. The groundwater remediation system includes ten groundwater extraction wells. Groundwater extraction rates vary between about 35 and 50 gpm. In 1999 and 2000, the groundwater remediation system removed approximately 104 pound of VOCs.
27. The 200 South Turnbull Canyon Road facility is located at the mouth of Puente Valley, approximately a mile from the planned location of the interim remedial action for the intermediate zone groundwater. The facility overlies soils consisting of interbedded silty sands, sandy clay and silty clays with traces of gravel and coarse sands lying over a medium of coarse sand. The depth to groundwater measured at the facility has varied between 27.29' bgs and 64.45' bgs.

14724 East Proctor Avenue

28. Respondent's subsidiary, Lucas Western, Inc. ("Lucas Western"), formerly known as Western Gear Corporation, operated the 14724 East Proctor Avenue facility from approximately 1974 to 1994. At this facility, Lucas Western manufactured printed circuit boards and used PCE, TCE, 1,1,1-TCA and methylene chloride for degreasing purposes. According to a facility audit, Lucas Western operated six degreasers, twelve sumps, three clarifiers, three catch basins, a 1,1,1-TCA recycling still and a number of underground storage tanks ("USTs")

29. During July and August 1985, Lucas Western's contractor collected soil matrix samples from seven soil borings drilled to a maximum depth of 49' bgs in several areas of concern. Laboratory analysis of these samples detected up to 620,000 µg/kg of PCE at 3' bgs and 24,000 µg/kg of PCE at 26' bgs, 830,000 µg/kg of 1,1,1-TCA at 3' bgs and 10,000 µg/kg of 1,1,1-TCA at 26' bgs, and 10,000 µg/kg of 1,1,1-TCA at 26' bgs. Lucas Western's contractor collected additional soil matrix samples from two additional soil borings in the former UST cluster area from December 1986 through January 1990. Laboratory analysis of these samples detected significant VOC concentrations at depths ranging down to 15' bgs.
30. On February 15, 1991, Lucas Western's contractor collected soil matrix samples from one soil boring drilled to a maximum depth of 55' bgs in the former UST cluster area. Laboratory analysis of these samples detected up to 1,800,000 µg/kg of PCE at 12' bgs, 320,000 µg/kg of 1,1,1-TCA at 12' bgs, and 550,000 µg/kg of 1,1-DCA at 5' bgs. During August and September 1993, Lucas Western's contractor collected concrete core and soil matrix samples from locations within the facility building. Laboratory analysis of these samples detected up to 430,000 µg/kg of PCE at 0.5' bgs, and 20,000 µg/kg of 1,1,1-TCA at 0.5' bgs.
31. From February through July 1994, Lucas Western's contractor collected soil matrix samples from 12 soil borings drilled to a maximum depth of 45' bgs. Laboratory analysis of samples collected at 5' bgs detected up to 8,600,000 µg/kg of PCE, 1,900,000 µg/kg of 1,1,1-TCA, 40,000 µg/kg of 1,1-DCA, 6,400 µg/kg of 1,1-DCE, and 4,800 µg/kg of TCE.
32. During August and September 1993, Lucas Western's contractor conducted a soil gas investigation of several areas of concern at the facility. Laboratory analysis of these samples detected up to 36,831 µg/l of PCE at 5' bgs, 55,343 µg/l of 1,1,1-TCA at 5' bgs, 19,021 µg/l of 1,1-DCE at 15' bgs, 10,881 µg/l of 1,1-DCA at 5' bgs, 3,570 µg/l of TCE at 25' bgs, and 870 µg/l of c-1,2-DCA at 15' bgs. Lucas Western's contractor conducted a second soil gas investigation at several areas of concern at the facility during February and March 1994. Laboratory analysis of these samples detected up to 3,446 µg/l of PCE at 15' bgs, 6,880 µg/l of 1,1,1-TCA at 15' bgs, 1,778 µg/l of 1,1-DCE at 15' bgs, 3,700 µg/l of 1,1-DCA at 5' bgs, 3,570 µg/l of TCE at 25' bgs, and 870 19,021 µg/l of cis-1,2-DCA at 15' bgs.
33. From July 1985 to February 1991, Lucas Western's contractor installed 22 groundwater monitoring wells. Laboratory analysis of these groundwater samples detected up to 4,800 µg/l of PCE at monitoring wells B-1 and B-9, 630 µg/l of TCE at monitoring well B-9, and 510 µg/l trans-1,2-DCE at monitoring well B-9. The highest VOC concentrations in groundwater were detected in the vicinity of former plating waste water treatment tank No. 14 and former clarifier and water soluble waste tank No. 15.
34. Twelve USTs located in the western corner of the 14724 East Proctor Avenue facility were removed in 1989. Additional USTs were removed in 1994-95. In 1995, Lucas Western began operating a soil vapor extraction system to clean up soils at four areas on the property.

35. The 14724 East Proctor Avenue facility is located at the mouth of Puente Valley, approximately 1.5 miles from the planned location of the interim remedial action for the intermediate zone groundwater. The facility overlies soils consisting of interbedded silty sands, sandy clay and silty clays with traces of gravel and coarse sands lying over a medium of coarse sand. The depth to groundwater measured at the facility has varied between 30.83' bgs and 37.88' bgs.

18301 East Arenth Avenue

36. Respondent owned and operated the 18301 East Arenth Avenue facility from approximately 1965 to 1980. At this facility, Respondent manufactured equipment for the automobiles, aircraft and appliances, and used PCE, TCE, and 1,1,1-TCA for degreasing metal parts. According to a facility audit, Respondent operated up to six degreasers, a floor drain system, sumps, several hazardous chemical storage areas, a clarifier, and one 1,000 gallon UST.
37. During July 1986, Respondent's contractor collected soil matrix samples from nine soil borings drilled to a maximum depth of 50' bgs in several areas of concern. Laboratory analysis of these samples detected up to 590,000 µg/kg of PCE at 3' bgs; 1,800 µg/kg of TCE at 3' bgs, and 12,000 µg/kg of 1,1,1-TCA at 3' bgs.
38. During October 1986, Respondent's contractor collected soil matrix samples from eight soil borings drilled to a maximum depth of 50' bgs in several areas of concern. Laboratory analysis of these samples detected up to 4,650 µg/kg of TCE at 20' bgs, 3,510 µg/kg of PCE at 5' bgs, and 1,190 µg/kg of 1,1,1-TCA at 20' bgs. During March 1987 and February 1988, Respondent's contractors collected additional soil matrix samples while installing groundwater monitoring wells. Laboratory analysis of some of these samples detected VOCs at depths ranging down to 40' bgs.
39. From February 1988 through April 1989, Respondent's contractor collected soil matrix samples from the former barrel storage area. Laboratory analysis of these samples detected up to 551 µg/kg of TCE at 40' bgs, 84 µg/kg of PCE at 30' bgs, and 8 µg/kg of 1,1,1-TCA at 30' bgs. During Jul7 1991, Respondent's contractor collected soil matrix samples from 36 soil borings drilled to a maximum depth of 26' bgs in several areas of concern. Laboratory analysis of these samples detected up to 1,100 µg/kg of PCE at 5' bgs, 230 µg/kg of TCE at 5' bgs, and 120 µg/kg of 1,1-DCE at 5' bgs.
40. During August 1990, Respondent's contractor conducted a soil gas investigation of several areas of concern at the facility. Laboratory analysis of these samples detected up to 50,000 µg/l of PCE at 4' bgs, 10,560 µg/l of 1,1,1-TCA at 4' bgs, and 33,025 µg/l of TCE at 4' bgs. Respondent's contractor conducted a second soil gas investigation at several areas of concern at the facility during June 1991. Laboratory analysis of these samples detected up to 4,000 µg/l of PCE at 4' bgs, 600 µg/l of 1,1,1-TCA at 4' bgs, and 3,000 µg/l of TCE at 4' bgs. The highest VOC concentrations were detected in the former degreaser area,

southeastern corner of the developed section of the property, former barrel storage area, sewer line, and heat treating area.

41. From July 1986 to August 1995, Respondent's contractors installed 8 groundwater monitoring wells. Laboratory analysis of groundwater samples from monitoring well MW-2 detected up to 770 µg/l of PCE at monitoring well MW-2, 710 µg/l of PCE, 840 µg/l of 1,1-DCE, and 380 µg/l of 1,1,1-TCA. Significant concentrations of PCE, TCE, 1,1-DCE and 1,1,1-TCA were also detected in monitoring wells MW-7, MW-8, MW-11 and MW-12.
42. The 18301 East Arenth Avenue facility is located at the east end of Puente Valley, approximately five miles upgradient from the planned location of the interim remedial action for the intermediate zone groundwater. The facility overlies soils consisting of interbedded silty sands, sandy clay and silty clays with traces of gravel and coarse sands lying over a medium of coarse sand. The depth to groundwater measured at the facility has varied between 30.00' bgs and 32.57' bgs.

Impact of the Releases

43. The above sampling results and other data collected at the Site indicate severe impact to groundwater quality from Respondents' releases. These investigations have shown that Respondent's contamination has also migrated off of the Property.
44. Hazardous substances released from Respondent's Facilities have migrated through the soil, contaminating groundwater beneath the Facilities. These hazardous substances have generally migrated towards and/or through the mouth of Puente Valley, and have commingled with hazardous substances from other facilities, creating a large plume of contaminated groundwater. Evidence of downward migration through the soil includes the soil gas and soil matrix samples collected at and around the Facilities demonstrating the presence of TCE, PCE, 1,1,1-TCA, 1,1,2-TCA, 1,1-DCE, 1,1-DCA, 1,2-DCA, methylene chloride, and other hazardous substances originating from Respondent's Facilities, and geologic investigations which have documented the highly permeable nature of the subsurface soils. Evidence of migration through the aquifer includes the presence of the same hazardous substances in samples collected from a network of monitoring wells installed in the PVOU, and computer simulations of groundwater flow and particle movement indicating that contamination originating at the Facilities has migrated through the PVOU.
45. The groundwater contamination from Respondent's Facilities and other sources in the PVOU has made it necessary for local water producers to install and operate wellhead treatment systems at public water supply wells at the Site. The affected water producers include the San Gabriel Valley Water Company ("SGVWC") and Suburban Water Systems. The SGVWC has detected contaminants in its B7 well field. Suburban Water Systems has also detected contaminants in its wells. This groundwater contamination threatens additional public water supply wells at the mouth of Puente Valley, and other presently uncontaminated sources of drinking water in and around the Site.

46. The selected interim remedy, as embodied in the ROD, requires containment of the contaminated groundwater in the shallow and intermediate depths to its current lateral and vertical extent and the continued monitoring of the groundwater at all depths (i.e., shallow, intermediate and deep). The objectives of the selected remedy are to contain and limit the movement of contaminated groundwater into clean or less contaminated areas and depths; remove significant mass of contamination from the groundwater; and provide the data necessary to determine, in a subsequent final Record of Decision, cleanup standards for the Site. These objectives are reflected in the ROD's Performance Criteria which are the principal requirements governing the design, implementation and evaluation of the interim remedial action. The selected interim remedy allows for the use of existing groundwater extraction wells, treatment and conveyance facilities, where feasible and appropriate, to meet the Performance Criteria.
47. The interim remedial action will reduce exposure to the contaminated groundwater by limiting the spread of the contamination into less contaminated and uncontaminated portions of the aquifer, and by reducing contaminant concentrations in the aquifer.

III. CONCLUSIONS OF LAW AND DETERMINATIONS

48. The Puente Valley Operable Unit is a "facility" as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9). The PVOU also contains "facilities" as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), including the Facilities formerly owned and operated by Respondent.
49. The substances referenced in Paragraphs 7, 8, and 43, found at the Site, and in connection with Respondent's Property, are "hazardous substances" as defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
50. These hazardous substances have been disposed of at the Site and have released and/or threaten to be released into the soil and groundwater, and have migrated and/or threaten to migrate from the Site.
51. Respondent is a "person" as defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
52. Respondent is a liable party as defined in Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), and is subject to this Order under Section 106(a) of CERCLA, 42 U.S.C. § 9606(a).
53. The past disposal and subsequent migration of hazardous substances at the Property and within the Site constitutes a "release" as defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).
54. The potential for future migration of hazardous substances from the Site poses a threat of a "release" as defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

55. The release or threat of release of one or more hazardous substances from the Facilities may present an imminent and substantial endangerment to the public health or welfare or the environment under Section 106(a) of CERCLA, 42 U.S.C. § 9606(a).
56. The contamination and endangerment at the Site constitutes an indivisible injury. The actions required by this Order are necessary to protect the public health or welfare or the environment. Respondent is jointly and severally responsible for all of the contamination at the Site.

IV. NOTICE TO THE STATE

57. On March 13, 2002, prior to issuing this Order, EPA notified the State of California Department of Toxic Substances Control that EPA would be issuing this Order.

V. ORDER

58. Based on the foregoing, Respondent is hereby ordered to comply with the following provisions, including but not limited to all attachments to this Order, all documents incorporated by reference into this Order, and all schedules and deadlines in this Order, attached to this Order, or incorporated by reference into this Order:

VI. DEFINITIONS

59. Unless otherwise expressly provided herein, terms used in this Order which are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or its implementing regulations. Whenever terms listed below are used in this Order, or in the documents attached to this Order, or incorporated by reference into this Order, the following definitions shall apply:
 - A. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601 et seq.
 - B. "Day" shall mean a calendar day unless expressly stated to be a working day. "Working day" shall mean a day other than a Saturday, Sunday, or Federal holiday. In computing any period of time under this Order, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the end of the next working day.
 - C. "EPA" shall mean the United States Environmental Protection Agency.
 - D. "DTSC" shall mean the California Department of Toxic Substances Control and any successor departments or agencies of DTSC.
 - E. "Hazardous Substance Superfund" or "Fund" shall mean the Hazardous Substance Superfund established by the Internal Revenue Code, 26 U.S.C. § 9507.

- F. "LARWQCB" shall mean the Los Angeles Regional Water Quality Control Board and any successor boards, departments, or agencies of LARWQCB.
- G. "National Contingency Plan" or "NCP" shall mean the National Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, codified at 40 C.F.R. Part 300, including any amendments thereto.
- H. "Operation and Maintenance" or "O&M" shall mean all activities required under the Compliance Monitoring Plan and the Operation and Maintenance Manual developed by Respondent pursuant to this Order and Section IV of the Statement of Work ("SOW"), and approved by EPA.
- I. "Paragraph" shall mean a portion of this Order identified by an arabic numeral.
- J. "Performance Criteria" shall mean those cleanup standards, standards of control, and other substantive requirements, criteria or limitations, identified in the SOW and the ROD, that the Remedial Action and Work required by this Order must attain and maintain.
- K. "PVOU" or "Site" shall mean the Puente Valley Operable Unit of the San Gabriel Valley Superfund Sites, Areas 1-4, in and near the cities of Industry and La Puente in Los Angeles County, California, and depicted generally in the ROD (Attachment 1).
- L. "Record of Decision" or "ROD" shall mean the EPA Record of Decision relating to the PVOU, signed on September 30, 1998, by the Regional Administrator, EPA Region 9, or her delegate, and all attachments thereto.
- M. "Remedial Action" or "RA" shall mean those activities, except for Operation and Maintenance, to be undertaken by Respondent to implement the final plans and specifications submitted by Respondent pursuant to the Remedial Design/Remedial Action Work Plan ("RD/RA Work Plan") approved by EPA, including any additional activities required under Sections X, XI, XII, XIII, and XIV of this Order.
- N. "Remedial Design" or "RD" shall mean those activities to be undertaken by Respondent to develop the final plans and specifications for the Remedial Action pursuant to the Remedial Design/Remedial Action Work Plan.
- O. "Remedial Design/Remedial Action Work Plan" or "RD/RA Work Plan" shall mean the work plan setting forth the Work to be performed by Respondent under this Order, as more fully described in Section IX of this Order and in the SOW.

- P. "Response Costs" shall mean all costs, including direct costs, indirect costs, and accrued interest incurred and to be incurred by the United States to perform or support response actions at the PVOU, and all basin-wide/non-operable unit specific costs that the United States has incurred and will incur in connection with the San Gabriel Valley Superfund Sites, Areas 1-4, which are attributable to the PVOU. Response costs include but are not limited to the costs of overseeing the Work, such as the costs of reviewing or developing plans, reports and other items pursuant to this Order and costs associated with verifying the Work.
- Q. "Statement of Work" or "SOW" shall mean the statement of work for implementation of the Remedial Design, Remedial Action, and Operation and Maintenance at the PVOU, that is set forth in Attachment 3 to this Order. The Statement of Work is incorporated into this Order and is an enforceable part of this Order.
- R. "Section" shall mean a portion of this Order identified by a roman numeral and which includes one or more paragraphs.
- S. "State" shall mean the State of California, including but not limited to the California Department of Toxic Substances, the California Regional Water Quality Control Board, and the California Department of Health Services, Drinking Water Field Operations Branch.
- T. "United States" shall mean the United States of America.
- U. "Work" shall mean all activities that Respondent is required to perform under this Order, including Remedial Design, Remedial Action, Operation and Maintenance, and any activities required to be undertaken pursuant to Sections VII through XXIV, and XXVII of this Order.

VII. NOTICE OF INTENT TO COMPLY

58. Respondent shall provide by facsimile, not later than three (3) days after the effective date of this Order, written notice to EPA's Project Manager stating whether it will comply with the terms of this Order. If Respondent does not unequivocally commit to perform the RD and RA as provided by this Order, Respondent shall be deemed to have violated this Order and to have failed or refused to comply with this Order. Respondent's written notice shall describe, using facts that exist on or prior to the effective date of this Order, any "sufficient cause" defenses asserted by Respondent under Sections 106(b) and 107(c)(3) of CERCLA, 42 U.S.C. §§ 9606(b) and 9607(c)(3). The absence of a response by EPA to the notice required by this Paragraph shall not be deemed to be acceptance of Respondent's assertions.

VIII. PARTIES BOUND

59. This Order shall apply to and be binding upon Respondent, its directors, officers, employees, agents, successors, and assigns. No change in the ownership, corporate status, or other control of Respondent shall alter any of Respondent's responsibilities under this Order.
60. Respondent shall provide a copy of this Order to any prospective owners or successors before a controlling interest in Respondent's assets, property rights, or stock are transferred to the prospective owner or successor. Respondent shall provide a copy of this Order to each contractor, sub-contractor, laboratory, or consultant retained to perform any Work under this Order, within five days after the effective date of this Order or on the date such services are retained, whichever date occurs later. Respondent shall also provide a copy of this Order to each person representing Respondent with respect to the PVOU or the Work and shall condition all contracts and subcontracts entered into hereunder upon performance of the Work in conformity with the terms of this Order. With regard to the activities undertaken pursuant to this Order, each contractor and subcontractor shall be deemed to be related by contract to Respondent within the meaning of Section 107(b)(3) of CERCLA, 42 U.S.C. § 9607(b)(3). Notwithstanding the terms of any contract, Respondent is responsible for compliance with this Order and for ensuring that its contractors, subcontractors and agents comply with this Order, and perform any Work in accordance with this Order.
61. Not later than sixty (60) days prior to any transfer by Respondent of any real property interest in any property included within the PVOU, Respondent shall submit a true and correct copy of the transfer document(s) to EPA, and shall identify the transferee by name, principal business address and effective date of the transfer.

IX. WORK TO BE PERFORMED

62. Respondent shall cooperate with EPA in providing information regarding the Work to the public. As requested by EPA, Respondent shall participate in the preparation of such information for distribution to the public and in public meetings which may be held or sponsored by EPA to explain activities at or relating to the Site.
63. All aspects of the Work to be performed by Respondent pursuant to this Order shall be under the direction and supervision of a qualified project manager the selection of whom shall be subject to approval by EPA. Within ten (10) days after the effective date of this Order, Respondent shall notify EPA in writing of the name and qualifications of the project manager, including primary support entities and staff, proposed to be used in carrying out Work under this Order. If at any time Respondent proposes to use a different project manager, Respondent shall notify EPA and shall obtain approval from EPA before the new project manager performs any Work under this Order.
64. EPA will review Respondent's selection of a project manager according to the terms of this Paragraph and Section XIV of this Order. If EPA disapproves of the selection of the project manager, Respondent shall submit to EPA within fourteen (14) days after receipt of

EPA's disapproval of the project manager previously selected, a list of project managers, including primary support entities and staff, that would be acceptable to Respondent. EPA will thereafter provide written notice to Respondent of the names of the project managers that are acceptable to EPA. Respondent may then select any approved project manager from that list and shall notify EPA of the name of the project manager selected within fourteen (14) days of EPA's designation of approved project managers.

65. Within thirty (30) days after the effective date of this Order, Respondent shall submit a Compliance and Sentinel Well Network Plan to EPA for review and approval. The Compliance and Sentinel Well Network Plan shall describe the proposed locations and specifications of the compliance and sentinel wells. Respondent shall submit the Compliance and Sentinel Well Complete Report thirty (30) days after work performed under the approved Compliance, Sentinel, and Investigatory Well Network Plan, and the second quarterly sampling event has been completed.
66. Within thirty (30) days after the approval of the Compliance Monitoring Plan Order, Respondent shall submit an initial RD/RA Work Plan to EPA for review and approval. Respondent shall update the RD/RA Work Plan in accordance with the SOW, and as otherwise required by EPA. The RD/RA Work Plan shall include a step-by-step plan for completing the Remedial Design and Remedial Action for the remedy described in the attached SOW and for attaining and maintaining all requirements, including the Performance Criteria, identified in the SOW and the ROD. The RD/RA Work Plan shall describe in detail the tasks and deliverables Respondent will complete during the Remedial Design and Remedial Action phases, and a schedule for completing all tasks and deliverables. Each iteration of the RD/RA Work Plan shall, to the extent possible, describe the major tasks and deliverables, including, but not be limited to, the following: (1) a conceptual design/preliminary design; (2) a pre-final design; (3) identification and satisfactory compliance with applicable permitting requirements; (4) a sampling and analysis plan; (5) a Construction Quality Assurance Plan (CQAP); (6) an Operation and Maintenance Manual; and (7) a Compliance Monitoring Plan.
67. The RD/RA Work Plan shall provide for implementation of the attached SOW, and shall comport with EPA's "Superfund Remedial Design/Remedial Action Handbook," U.S. EPA, Office of Emergency and Remedial Response, June 15, 1995, EPA 540/R-95/059. Upon approval by EPA, the RD/RA Work Plan and future revisions or addenda to the RD/RA Work Plan are incorporated into this Order as a requirement of this Order and shall be an enforceable part of this Order.
68. Upon approval of the RD/RA Work Plan by EPA, Respondent shall complete the Remedial Design and perform the Remedial Action by implementing the RD/RA Work Plan according to the schedule in the approved RD/RA Work Plan. Any violation of the RD/RA Work Plan shall be a violation of this Order.
69. Respondent shall submit a Sampling and Analysis Plan and Site Health and Safety Plan for field activities with the Preliminary Design. The Site Health and Safety Plan shall conform

to the applicable Occupational Safety and Health Administration and EPA requirements, including but not limited to the requirements in 29 C.F.R. § 1910.120.

70. Within sixty (60) days after the compliance and sentinel wells have been installed and sampled twice, with one quarter between sampling rounds, Respondent shall submit the Conceptual Remedial Design, as described in the attached Statement of Work, for EPA review and approval. Except as modified by EPA prior to the due date, Respondent shall submit a Conceptual Remedial Design for each potential Remedial Action option, including, but not limited to: (1) a system which incorporates use of San Gabriel Valley Water Company's B7 wells; (2) a system which incorporates the wells and/or treatment systems of other local water purveyors, including the Suburban Water Company; (3) an independent extraction and treatment system which includes the options of (a) delivering the treated groundwater to a water purveyor and (b) discharging the treated groundwater to a surface water body or groundwater. Each of the above shall be prepared as a stand-alone design, but may be presented in a single Conceptual Remedial Design submittal. The Conceptual Design submittal shall include, at a minimum, the following: (1) a detailed Design Basis Report that presents and justifies the concepts, assumption, standards, and preliminary interpretations and calculations used in the design, and shall include, but not necessarily be limited to the all items listed in Section IV.E.1.a.1 - 16 of the SOW; (2) an Updated Construction Schedule for construction and implementation of the Remedial Action which identifies timing for initiation and completion of all critical path tasks; (3) an updated list of permits, regulatory agency approvals, MOUs, access or use agreements, easements, and properties developed or acquired to date; copies of permits, approvals, and agreements not previously supplied to EPA; and activities and schedules for obtaining outstanding items required before start of construction (e.g., for use of existing facilities or disposition of the treated water).
71. Within thirty (30) days after EPA approval of the Conceptual Remedial Design, Respondent shall submit the Preliminary Remedial Design. Except as modified by EPA prior to the due date, Respondent shall submit a Preliminary Remedial Design for each potential Remedial Action option, including, but not limited to: (1) a system which incorporates use of San Gabriel Valley Water Company's B7 wells; (2) a system which incorporates the wells and/or treatment systems of other local water purveyors, including the Suburban Water Company; (3) an independent extraction and treatment system which includes the options of (a) delivering the treated groundwater to a water purveyor and (b) discharging the treated groundwater to a surface water body or groundwater. Each of the above shall be prepared as a stand-alone design, but may be presented in a single Conceptual Remedial Design submittal. The Preliminary Design submittal shall include, at a minimum, the following: (1) any changes to the Design Basis Report submitted as part of the Conceptual Design; (2) preliminary plans, specifications, and drawings of groundwater extraction, treatment, conveyance, and monitoring systems; (3) outline of required specifications; (4) an Updated Construction Schedule for construction and implementation of the Remedial Action which identifies timing for initiation and completion of all critical path tasks; (5) an updated list of permits, regulatory agency approvals, MOUs, access or use agreements, easements, and properties developed or acquired to date; copies of permits, approvals, and agreements not previously supplied to EPA; and activities and

schedules for obtaining outstanding items required before start of construction (e.g., for use of existing facilities or disposition of the treated water); and (6) a Sampling and Analysis Plan, which shall address performance of compliance monitoring and carry out any other field investigations needed to complete the remedial design, and construct and operate the remedial action. The Plan shall discuss the timing of data collection activities, including data collection activities needed to establish baseline conditions before startup of the remedial action.

72. Within sixty (60) days after EPA approval of the Conceptual/Preliminary Design, Respondent shall submit a Pre-Final/Final Design to EPA for review and approval. Except as modified by EPA prior to the due date, Respondent shall submit a Pre-Final/Final Design Remedial Design for each potential Remedial Action option, including, but not limited to: (1) a system which incorporates use of San Gabriel Valley Water Company's B7 wells; (2) a system which incorporates the wells and/or treatment systems of other local water purveyors, including the Suburban Water Company; (3) an independent extraction and treatment system which includes the options of (a) delivering the treated groundwater to a water purveyor and (b) discharging the treated groundwater to a surface water body or groundwater. Each of the above shall be prepared as a stand-alone design, but may be presented in a single Conceptual Remedial Design submittal. The Pre-Final/Final Design shall be, if necessary, a draft version of the Final Design. The Prefinal/Final Design shall fully address all comments made on the Preliminary Design Report, and if not previously addressed, be accompanied by a memorandum indicating how the comments were incorporated into the Prefinal Design. The Pre-Final/Final Design submittal shall include, at a minimum, the following: (1) revised plans and specifications; (2) a draft Operation and Maintenance Manual; and (3) a Construction Quality Assurance Plan (CQAP). The CQAP shall describe the approach to quality assurance during construction activities at the PVOU and shall specify a quality assurance official (QA Official), independent of the construction contractor, to conduct a quality assurance program during the construction phase of the project.
73. Upon EPA approval, the Pre-Final/Final Design submittal shall become the Final Design and be incorporated into this Order as a requirement of this Order and shall be an enforceable part of this Order.
74. If Respondent seeks to retain a construction contractor to assist in the performance of the Remedial Action, then Respondent shall submit a copy of the contractor solicitation documents to EPA as follows: (1) if a design-build approach is used, then Respondent shall submit contractor solicitation documents to EPA within thirty (30) days after EPA approval of the Preliminary Remedial Design; or (2) if a design-bid-build approach is used, then Respondent shall submit contractor solicitation documents to EPA within thirty (30) days after EPA approval of the final design.
75. Forty-five (45) days after EPA approval of the Final Design, Respondent shall notify EPA in writing of the name, title, and qualifications of any construction contractors that may be used in carrying out work under this Order. EPA shall thereafter provide written notice of the name(s) of the contractor(s) it disapproves, if any. Respondent may select any

contractor not disapproved and shall notify EPA of the name of the contractor selected within 5 days of selection. If at any time Respondent proposes to change the construction contractor, Respondent shall notify EPA and shall obtain approval from EPA as provided in this Paragraph, before the new construction contractor performs any work under this Order. If EPA disapproves of the selection of any contractor as the construction contractor, Respondent shall submit a list of contractors that would be acceptable to them to EPA within thirty (30) days after receipt of EPA's disapproval of the contractor previously selected.

76. The Work performed by Respondent pursuant to this Order shall, at a minimum, achieve the Performance Criteria specified in Section III of the SOW and the ROD, consistent with the approved Compliance Monitoring Plan.
77. Notwithstanding any action by EPA, Respondent shall remain fully responsible for achievement of the Performance Criteria in the SOW and the ROD. Nothing in this Order, or in the SOW or ROD, or in EPA's approval of the Remedial Design/Remedial Action Work Plan, or approval of any other submission, shall be deemed to constitute a warranty or representation of any kind by EPA that full performance of the Remedial Design or Remedial Action will achieve the Performance Criteria set forth in Section III of the SOW or in the ROD. Respondent's compliance with such approved documents does not foreclose EPA from seeking additional work to achieve the Performance Criteria.
78. Respondent shall, prior to any off-site shipment of hazardous substances from the PVOU to an out-of-state waste management facility, provide written notification to the appropriate state environmental official in the receiving state and to EPA's RPM of such shipment of hazardous substances. However, the notification of shipments shall not apply to any shipments when the total volume of all shipments from the PVOU to the state will not exceed ten (10) cubic yards.
 - A. The notification shall be in writing, and shall include the following information, where available: (1) the name and location of the facility to which the hazardous substances are to be shipped; (2) the type and quantity of the hazardous substances to be shipped; (3) the expected schedule for the shipment of the hazardous substances; and (4) the method of transportation. Respondent shall notify the receiving state of major changes in the shipment plan, such as a decision to ship the hazardous substances to another facility within the same state, or to a facility in another state.
 - B. The identity of the receiving facility and State will be determined by Respondent following the award of the contract for Remedial Action construction. Respondent shall provide all relevant information, including information under the categories noted in Paragraph 77.A above, on the shipments as soon as practicable after the award of the contract and before the hazardous substances are actually shipped.

79. Within forty-five (45) days after Respondent concludes that the Remedial Action, including all Operation and Maintenance activities, has been fully performed, Respondent shall so notify EPA and shall schedule and conduct a pre-certification inspection to be attended by Respondent and EPA. The pre-certification inspection shall be followed by a written report, submitted within thirty (30) days of the inspection by a registered professional engineer and Respondent's Project Manager, certifying that the Remedial Action has been completed in full satisfaction of the requirements of this Order. If, after completion of the pre-certification inspection and receipt and review of the written report, EPA determines that the Remedial Action or any portion thereof has not been completed in accordance with this Order, EPA shall notify Respondent in writing of the activities that must be undertaken to complete the Remedial Action and shall set forth in the notice a schedule for performance of such activities. Respondent shall perform all activities described in the notice in accordance with the specifications and schedules established therein. If EPA concludes, following the initial or any subsequent certification of completion by Respondent that the Remedial Action has been fully performed in accordance with this Order, EPA may notify Respondent that the Remedial Action has been fully performed. EPA's notification shall be based on present knowledge and Respondent's certification to EPA, and shall not limit EPA's right to perform periodic reviews pursuant to Section 121(c) of CERCLA, 42 U.S.C. § 9621(c), or to take or require any action that in the judgment of EPA is appropriate at the PVOU, in accordance with Sections 104, 106, or 107 of CERCLA, 42 U.S.C. §§ 9604, 9606, or 9607, or any other applicable law.
80. Within thirty (30) days after Respondent concludes that all phases of the Work have been fully performed, that the Performance Criteria have been attained, and that all Operation and Maintenance activities have been completed, Respondent shall submit to EPA a written report by a registered professional engineer certifying that the Work has been completed in full satisfaction of the requirements of this Order. EPA shall require such additional activities as may be necessary to complete the Work or EPA may, based upon present knowledge and Respondent's certification to EPA, issue written notification to Respondent that the Work has been completed, as appropriate. EPA's notification shall not limit EPA's right to perform periodic reviews pursuant to Section 121(c) of CERCLA, 42 U.S.C. § 9621(c), or to take or require any action that in the judgment of EPA is appropriate at the PVOU, in accordance with Sections 104, 106, or 107 of CERCLA, 42 U.S.C. §§ 9604, 9606, or 9607, or any other applicable law.

X. FAILURE TO ATTAIN PERFORMANCE CRITERIA

81. Respondent shall be responsible for attaining and maintaining compliance with the Performance Criteria at all times. Failure to attain or maintain compliance with any of the Performance Criteria at any time is a violation of this Order which shall, at EPA's discretion, make Respondent subject to the enforcement actions and penalties set forth in Section XXVI of this Order.

82. Respondent shall not implement the Remedial Action or conduct Operation and Maintenance in such manner that it increases the migration of contamination into production wells that are not part of the interim remedial action or otherwise causes adverse effects. Respondent shall implement the Remedial Action and conduct Operation and Maintenance in such manner that it provides sufficient capture of contaminated groundwater without relying on the effects of groundwater extraction that is not part of the interim remedial action.
83. In the event that EPA determines that additional response activities are necessary to meet or maintain compliance with applicable Performance Criteria, EPA may require Respondent to perform additional response actions.
84. Unless otherwise stated by EPA, within thirty (30) days of receipt of notice from EPA that additional response activities are necessary to meet any applicable Performance Criteria, Respondent shall submit for approval by EPA a work plan for the additional response activities. The plan shall conform to the applicable requirements of Sections IX, XVI, and XVII of this Order. Upon EPA's approval of the plan pursuant to Section XIV, Respondent shall implement the plan for additional response activities in accordance with the provisions and schedule contained therein.

XI. EPA PERIODIC REVIEW

85. Under Section 121(c) of CERCLA, 42 U.S.C. § 9621(c), and any applicable regulations, EPA may conduct a review at the PVOU to assure that the Work performed pursuant to this Order adequately protects human health and the environment. Until such time as EPA certifies completion of the Work, Respondent shall conduct the requisite studies, investigations, or other response actions as determined necessary by EPA in order to permit EPA to conduct the review under Section 121(c) of CERCLA, 42 U.S.C. § 9621(c). As a result of any review performed under this Paragraph, Respondent may be required to perform additional Work or to modify Work previously performed.

XII. ADDITIONAL RESPONSE ACTIONS

86. EPA may determine that in addition to the Work identified in this Order and attachments to this Order, additional response activities may be necessary to protect human health and the environment. If EPA determines that additional response activities are necessary, EPA may require Respondent to submit a work plan for additional response activities. EPA may also require Respondent to modify any plan, design, or other deliverable required by this Order, including any approved modifications.
87. Not later than thirty (30) days after receiving EPA's notice that additional response activities are required pursuant to this Section, Respondent shall submit a work plan for the response activities to EPA for review and approval. Upon approval by EPA, the work plan is incorporated into this Order as a requirement of this Order and shall be an enforceable part of this Order. Upon approval of the work plan by EPA, Respondent shall implement the work plan according to the standards, specifications, and schedule in the approved

work plan. Respondent shall notify EPA of its intent to perform such additional response activities within seven (7) days after receipt of EPA's request for additional response activities.

XIII. ENDANGERMENT AND EMERGENCY RESPONSE

88. In the event of any action or occurrence during the performance of the Work which causes or threatens to cause a release of a hazardous substance or which may present an immediate threat to public health or welfare or the environment, Respondent shall immediately take all appropriate action to prevent, abate, or minimize the threat, and shall immediately notify EPA's Remedial Project Manager ("RPM") or, if the RPM is unavailable, the RPM's Section Chief. If neither of these persons is available, Respondent shall notify the EPA Emergency Response Office, Region 9. Respondent shall take such action in consultation with EPA's RPM and in accordance with all applicable provisions of this Order, including but not limited to the Health and Safety Plan. In the event that Respondent fails to take appropriate response action as required by this Section, and EPA takes that action instead, Respondent shall reimburse EPA for all costs of the response action not inconsistent with the NCP. Respondent shall pay the Response Costs in the manner described in Section XXIV of this Order, within thirty (30) days of Respondent's receipt of demand for payment and a reconciled EPA financial cost summary of the costs incurred.
89. Nothing in the preceding Paragraph shall be deemed to limit any authority of the United States to take, direct, or order all appropriate action to protect human health and the environment or to prevent, abate, or minimize an actual or threatened release of hazardous substances on, at, or from the PVOU.

XIV. EPA REVIEW OF SUBMISSIONS

90. All deliverables shall be submitted to EPA, LARWQCB, and DTSC concurrently. After review of any deliverable, plan, report or other item which is required to be submitted for review and approval pursuant to this Order, EPA may: (a) approve the submission; (b) approve the submission with modifications; (c) disapprove the submission and direct Respondent to re-submit the document after incorporating EPA's comments; or (d) disapprove the submission and assume responsibility for performing all or any part of the response action. As used in this Order, the terms "approval by EPA," "EPA approval," or a similar term means the action described in items (a) or (b) of this Paragraph.
91. In the event of approval or approval with modifications by EPA, Respondent shall proceed to take any action required by the plan, report, or other item, as approved or modified by EPA.
92. Upon receipt of a notice of disapproval or a request for a modification, Respondent shall, within the time specified in the attached SOW or such longer time as specified by EPA in its notice of disapproval or request for modification, correct the deficiencies and resubmit the plan, report, or other item for approval. Notwithstanding the notice of disapproval, or

approval with modifications, Respondent shall proceed, at the direction of EPA, to take any action required by any non-deficient portion of the submission.

93. If any submission is disapproved by EPA, Respondent shall be deemed to be in violation of this Order.

XV. PROGRESS REPORTS

94. In addition to the other deliverables set forth in this Order, Respondent shall provide monthly progress reports to EPA with respect to actions and activities undertaken pursuant to this Order. The progress reports shall be submitted on or before the 10th day of each month following the effective date of this Order. Respondent's obligation to submit progress reports continues until EPA gives Respondent written notice that the Work has been completed. At a minimum these progress reports shall: (1) describe the actions which have been taken to comply with this Order during the prior month; (2) summarize test, sampling, or operating data generated or obtained by Respondent and not previously submitted to EPA; (3) provide any preliminary calculations and supporting data used to evaluate performance; (4) describe all work planned for the next two months with schedules relating such work to the overall project schedule for RD/RA completion; and (5) describe all problems encountered (including the nature of and duration of any noncompliance) and any anticipated problems, any actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays.

XVI. QUALITY ASSURANCE, SAMPLING AND DATA ANALYSIS

95. Respondent shall use the quality assurance, quality control, and chain of custody procedures described in the "EPA NEIC Policies and Procedures Manual," May 1978, revised May 1986, "EPA Guidance for the Data Quality Objectives Process" (EPA QA/G-4), "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," November 1999 (EPA QA/R-5), "Guidance for Quality Assurance Project Plans" February 1998 (EPA QA/G-5), EPA Region 9 "Sampling and Analysis Plan Guidance and Template, Version 2," March 2000 (R9QA/002), and any amendments to these documents, while conducting all sample collection and analysis activities required herein by any plan. To provide quality assurance and maintain quality control, Respondent shall:
- A. Use only laboratories which have a documented Quality Assurance Program that complies with EPA guidance document EPA QA/R-5 (EPA Requirements for Quality Assurance Project Plans).
 - B. Ensure that the laboratory used by Respondent for analyses performs according to a method or methods deemed satisfactory to EPA, is prepared to submit all protocols to be used for analyses to EPA at least 14 days before beginning analysis (if requested), and maintains protocols according to the record preservation requirements included in Section XXI.

- C. Ensure that EPA personnel and EPA's authorized representatives are allowed access to the laboratory and personnel utilized by Respondent for analyses.
96. Respondent shall notify EPA not less than fourteen (14) days in advance of any sample collection activity. At the request of EPA, Respondent shall allow split or duplicate samples to be taken by EPA or its authorized representatives, of any samples collected by Respondent with regard to the PVOU or pursuant to the implementation of this Order. In addition, EPA shall have the right to take any additional samples that EPA deems necessary.

XVII. COMPLIANCE WITH APPLICABLE LAWS

97. All activities by Respondent pursuant to this Order shall be performed in accordance with the requirements of all Federal and state laws and regulations. EPA has determined that the activities contemplated by this Order are consistent with the NCP.
98. Except as provided in Section 121(e) of CERCLA and the NCP, no permit shall be required for any portion of the Work conducted entirely on-site (i.e., within the areal extent of contamination at the PVOU or in very close proximity to the contamination and necessary for implementation of the Work). The service of treated groundwater to the public is considered to be an off-site activity. Where any portion of the Work requires a Federal or state permit or approval, Respondent shall submit timely and complete applications and take all other actions necessary to obtain and to comply with all such permits or approvals.
99. This Order is not, and shall not be construed to be, a permit issued pursuant to any Federal or state statute or regulation.
100. All materials removed from the PVOU shall be disposed of or treated at a facility approved by EPA's RPM and in accordance with Section 121(d)(3) of CERCLA, 42 U.S.C. § 9621(d)(3); with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440; and with all other applicable Federal, state, and local requirements.

XVIII. EPA PROJECT MANAGER

101. All communications, whether written or oral, from Respondent to EPA shall be directed to EPA's Project Manager. Respondent shall submit to EPA three copies of all documents, including plans, reports, and other correspondence, which are developed pursuant to this Order, and shall send these documents by overnight mail or by certified mail, return receipt requested. Respondent shall also submit one copy of each deliverable to the project managers for DTSC, LARWQCB, and any other State agencies, as specified by the EPA Project Manager.

(A) EPA's Project Manager is:

Penelope McDaniel
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street (SFD-7-3)
San Francisco, CA 94105
phone: (415) 972-3178
fax: (415) 947-3526
email: mcdaniel.penelope@epa.gov

(B) DTSC's Project Manager is:

Jacalyn Spizman
California Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630
phone: (714) 484-5460
fax: (714) 484-5438
email: jspizma@dtsc.ca.gov

(C) LARWQCB's Project Manager is:

Dixon Oriola
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013
phone: (213) 576-6803
fax: (213) 576-6717
email: doriola@rb4swrcb.ca.gov

One or more copies of each deliverable shall also be sent to EPA contractors, as specified by the EPA Project Manager.

102. EPA has the unreviewable right to change its Project Manager. If EPA changes its Project Manager, EPA will inform Respondent in writing of the name, address, and telephone number of the new Project Manager.
103. EPA's Project Manager shall have the authority lawfully vested in a Remedial Project Manager ("RPM") and On-Scene Coordinator ("OSC") by the National Contingency Plan, 40 C.F.R. Part 300. EPA's Project Manager shall have authority, consistent with the National Contingency Plan, to halt any work required by this Order, and to take any necessary response action.

XIX. ACCESS TO SITE NOT OWNED BY RESPONDENT

104. To the extent that access to any portion of the PVOU, or any other property, owned or controlled by persons other than Respondent is necessary in order to perform the Work required by this Order, Respondent will obtain, or use its best efforts to obtain, site access agreements from the present owner(s) within 60 days of the effective date of this Order. Such agreements shall provide access for EPA, its contractors and oversight officials, the state and its contractors, and Respondent or Respondent's authorized representatives and contractors, and such agreements shall specify that Respondent is not EPA's representative with respect to liability associated with activities at the property. Respondent shall save and hold harmless the United States and its officials, agents, employees, contractors, subcontractors, or representatives for or from any and all claims or causes of action or other costs incurred by the United States including but not limited to attorneys fees and other expenses of litigation and settlement arising from or on account of acts or omissions of Respondent, its officers, directors, employees, agents, contractors, subcontractors, and any persons acting on Respondent's behalf or under its control, in carrying out activities pursuant to this Order, including any claims arising from any designation of Respondent as EPA's authorized representatives under Section 104(e) of CERCLA. Copies of such agreements shall be provided to EPA prior to Respondent's initiation of field activities. Respondent's best efforts shall include the payment of reasonable sums of money in consideration of access. If access agreements are not obtained within the time referenced above, Respondent shall immediately notify EPA of its failure to obtain access. Subject to the United States' non-reviewable discretion, EPA may use its legal authorities to obtain access for Respondent, may perform those response actions with EPA contractors at the property in question, or may terminate the Order if Respondent cannot obtain access agreements. If EPA performs those tasks or activities with contractors and does not terminate the Order, Respondent shall perform all other activities not requiring access to that property, and shall reimburse EPA, pursuant to Section XXIV of this Order, for all costs incurred in performing such activities. Respondent shall integrate the results of any such tasks undertaken by EPA into its reports and deliverables. Respondent shall reimburse EPA, pursuant to Section XXIV of this Order, for all Response Costs (including attorney fees) incurred by the United States to obtain access for Respondent.

XX. SITE ACCESS AND DATA / DOCUMENT AVAILABILITY

105. Respondent shall allow EPA and its authorized representatives and contractors to enter and freely move about all property at the PVOU to which Respondent has access and which is subject to or affected by the work under this Order or where documents required to be prepared or maintained by this Order are located, for the following purposes: inspecting conditions, activities, the results of activities, records, operating logs, and contracts related to the Work or Respondent and its representatives or contractors pursuant to this Order; reviewing the progress of Respondent in carrying out the terms of this Order; conducting tests as EPA or its authorized representatives or contractors deem necessary; using a camera, sound recording device or other documentary type equipment; and verifying the data submitted to EPA by Respondent. Respondent shall allow EPA and its authorized representatives to enter any property within the PVOU to which Respondent has access, to

inspect and copy all records, files, photographs, documents, sampling and monitoring data, and other writings related to Work undertaken in carrying out this Order. Nothing herein shall be interpreted as limiting or affecting EPA's right of entry or inspection authority under Federal law.

106. Respondent may assert a claim of business confidentiality covering part or all of the information submitted to EPA pursuant to the terms of this Order under 40 C.F.R. § 2.203, provided such claim is not inconsistent with Section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7) or other provisions of law. This claim shall be asserted in the manner described by 40 C.F.R. § 2.203(b) and substantiated by Respondent at the time the claim is made. Information determined to be confidential by EPA will be given the protection specified in 40 C.F.R. Part 2. If no such claim accompanies the information when it is submitted to EPA, it may be made available to the public by EPA or the state without further notice to Respondent. Respondent shall not assert confidentiality claims with respect to any data related to conditions, sampling, or monitoring within the PVOU.
107. Respondent shall maintain for the period during which this Order is in effect, an index of documents that Respondent claims contain confidential business information. The index shall contain, for each document, the date, author, addressee, and subject of the document. Upon written request from EPA, Respondent shall submit a copy of the index to EPA.

XXI. RECORD PRESERVATION

108. Respondent shall provide to EPA upon request, copies of all documents and information within its possession and/or control or that of its contractors or agents relating to activities at or near the PVOU or to the implementation of this Order, including but not limited to sampling, analysis, chain of custody records, manifests, trucking logs, receipts, reports, sample traffic routing, correspondence, or other documents or information related to the Work. Respondent shall also make available to EPA for purposes of investigation, information gathering, or testimony, its employees, agents, or representatives with knowledge of relevant facts concerning the performance of the Work.
109. Until six (6) years after EPA provides notice that all Work required under this Order has been completed, Respondent shall preserve and retain all records and documents in its possession or control, and shall instruct its contractors and agents to preserve and retain all records and documents in its possession or control, that relate in any manner to the PVOU or the Work. At the conclusion of this document retention period, Respondent shall notify the United States at least ninety (90) calendar days prior to the destruction of any such records or documents, and upon request by the United States, Respondent shall deliver any such records or documents to EPA.
110. Within forty-five (45) days after the effective date of this Order, Respondent shall submit a written certification to EPA's RPM that it has not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents or other information relating to its potential liability with regard to the PVOU since notification of potential liability by the United States or the State or the filing of suit against it regarding the PVOU. Respondent

shall not dispose of any such documents without prior approval by EPA. Respondent shall, upon EPA's request and at no cost to EPA, deliver the documents or copies of the documents to EPA.

XXII. DELAY IN PERFORMANCE

111. Any delay in performance of this Order that, in EPA's judgment, is not properly justified by Respondent under the terms of this Section shall be considered a violation of this Order. Any delay in performance of this Order shall not affect Respondent's obligations to fully perform all obligations under the terms and conditions of this Order.
112. Respondent shall notify EPA of any delay or anticipated delay in performing any requirement of this Order. Such notification shall be made by telephone to EPA's Project Manager within forty eight (48) hours after Respondent first knew or should have known that a delay might occur. Respondent shall adopt all reasonable measures to avoid or minimize any such delay. Within five (5) business days after notifying EPA by telephone, Respondent shall provide written notification fully describing the nature of the delay, any justification for delay, any reason why Respondent should not be held strictly accountable for failing to comply with any relevant requirements of this Order, the measures planned and taken to minimize the delay, and a schedule for implementing the measures that will be taken to mitigate the effect of the delay. Increased costs or expenses associated with implementation of the activities called for in this Order is not a justification for any delay in performance.

XXIII. ASSURANCE OF ABILITY TO COMPLETE WORK

113. Respondent shall demonstrate the ability to complete the Work required by this Order and to pay all claims that arise from the performance of the Work by obtaining and presenting to EPA within sixty (60) days after the effective date of this Order, one of the following: (1) a performance bond; (2) a letter of credit; (3) a guarantee by a third party; or (4) internal financial information to allow EPA to determine that Respondent has sufficient assets available to perform the Work. Respondent shall demonstrate financial assurance in an amount no less than \$13 million. If Respondent seeks to demonstrate its ability to complete the Remedial Action by means of internal financial information, or by guarantee of a third party, Respondent shall re-submit such information annually, on the anniversary of the effective date of this Order. If EPA determines that such financial information is inadequate, Respondent shall, within thirty (30) days after receipt of EPA's notice of determination, obtain and present to EPA for approval one of the other three forms of financial assurance listed above.
114. At least seven (7) days prior to commencing any work at the PVOU pursuant to this Order, Respondent shall submit to EPA a certification that Respondent or its contractors and subcontractors have adequate insurance coverage or have indemnification for liabilities for injuries or damages to persons or property which may result from the activities to be conducted by or on behalf of Respondent pursuant to this Order. Respondent shall ensure

that such insurance or indemnification is maintained for the duration of the Work required by this Order.

XXIV. REIMBURSEMENT OF RESPONSE COSTS

115. Respondent shall reimburse EPA, upon written demand, for all Response Costs incurred by the United States in overseeing Respondent's implementation of the requirements of this Order or in performing any response action which Respondent fails to perform in compliance with this Order. EPA may submit to Respondent on a periodic basis an accounting of all Response Costs incurred by the United States with respect to this Order. EPA's certified Agency Financial Management System summary data ("SPUR Reports"), or such other summary as certified by EPA, shall serve as basis for payment demands.
116. Respondent shall, within thirty (30) days of receipt of each EPA accounting, remit a certified or cashier's check for the amount of those costs. Interest shall accrue from the later of the date that payment of a specified amount is demanded in writing or the date of the expenditure. The interest rate is the rate established by the Department of the Treasury pursuant to 31 U.S.C. § 3717 and 4 C.F.R. § 102.13.
117. Checks shall be made payable to the Hazardous Substances Superfund and shall include a reference to the Puente Valley Operable Unit of the San Gabriel Valley Superfund Sites, the site identification number (CAD980817985), the account number (098V), and the title of this Order. Checks shall be forwarded to:

U.S. Environmental Protection Agency - Region 9
ATTENTION: Superfund Accounting
P.O. Box 360863M
Pittsburgh, PA 15251

118. Respondent shall send copies of each transmittal letter and check to the EPA Project Manager.

XXV. UNITED STATES NOT LIABLE

119. The United States, by issuance of this Order, assumes no liability for any injuries or damages to persons or property resulting from acts or omissions by Respondent, or its directors, officers, employees, agents, representatives, successors, assigns, contractors, or consultants in carrying out any action or activity pursuant to this Order. Neither EPA nor the United States may be deemed to be a party to any contract entered into by Respondent or its directors, officers, employees, agents, successors, assigns, contractors, or consultants in carrying out any action or activity pursuant to this Order.

XXVI. ENFORCEMENT AND RESERVATIONS

120. EPA reserves the right to bring an action against Respondent under Section 107 of CERCLA, 42 U.S.C. § 9607, for recovery of any Response Costs incurred by the United

States related to this Order and not reimbursed by Respondent. This reservation shall include but not be limited to past costs, future costs, direct costs, indirect costs, the costs of oversight, the costs of compiling the cost documentation to support oversight cost demand, as well as accrued interest as provided in Section 107(a) of CERCLA.

121. Notwithstanding any other provision of this Order, at any time during the response action, EPA may perform its own studies, complete the response action (or any portion of the response action) as provided in CERCLA and the NCP, and seek reimbursement from Respondent for its costs, or seek any other appropriate relief.
122. Nothing in this Order shall preclude EPA from taking any additional enforcement actions, including modification of this Order or issuance of additional Orders, and/or additional remedial or removal actions as EPA may deem necessary, or from requiring Respondent in the future to perform additional activities pursuant to Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), or any other applicable law. Respondent shall be liable under CERCLA Section 107(a), 42 U.S.C. § 9607(a), for the costs of any such additional actions under CERCLA.
123. Notwithstanding any provision of this Order, the United States hereby retains all of its information gathering, inspection and enforcement authorities and rights under CERCLA, RCRA and any other applicable statutes or regulations.
124. Respondent shall be subject to civil penalties under Section 106(b) of CERCLA, 42 U.S.C. § 9606(b), of not more than \$27,500 for each day in which Respondent willfully violates, or fails or refuses to comply with this Order without sufficient cause. In addition, failure to properly provide response action under this Order, or any portion hereof, including failure to attain or maintain compliance with the Performance Criteria, without sufficient cause, may result in liability under Section 107(c)(3) of CERCLA, 42 U.S.C. § 9607(c)(3), for punitive damages in an amount at least equal to, and not more than three times the amount of any costs incurred by the Fund as a result of such failure to take proper action.
125. Nothing in this Order shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person for any liability it may have arising out of or relating in any way to the Site.
126. If a court issues an order that invalidates any provision of this Order or finds that Respondent has sufficient cause not to comply with one or more provisions of this Order, Respondent shall remain bound to comply with all provisions of this Order not invalidated by the court's order.

XXVII. ADMINISTRATIVE RECORD

127. Upon request by EPA, Respondent must submit to EPA all documents related to the selection of the response action for possible inclusion in the administrative record file.

XXVIII. EFFECTIVE DATE AND COMPUTATION OF TIME

128. This Order shall be effective five (5) days after the Order is signed by the Director of the Superfund Division, U.S. EPA Region 9. All times for performance of ordered activities shall be calculated from this effective date.

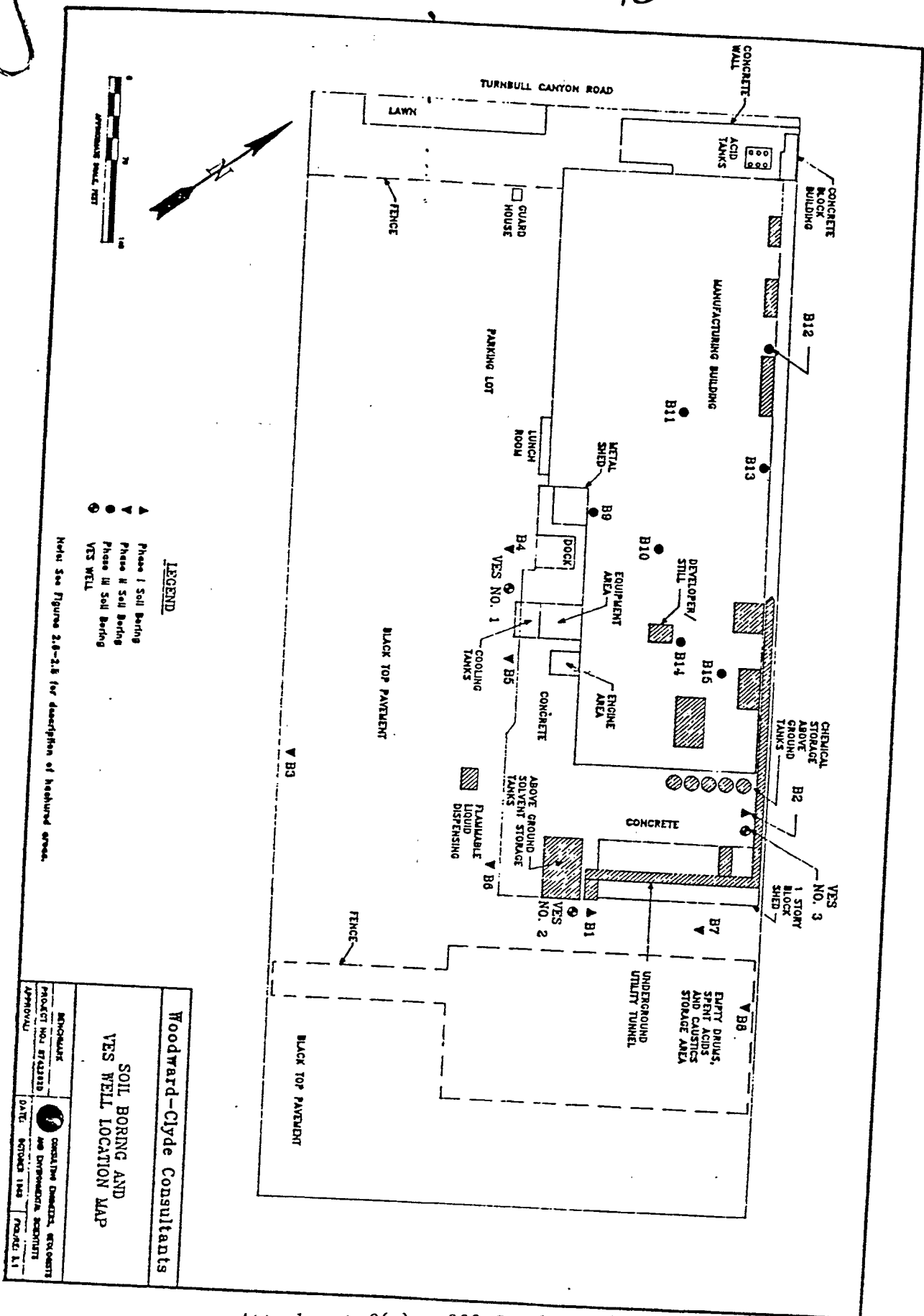
XXIX. OPPORTUNITY TO CONFER

129. Respondent may, within ten (10) days after the date this Order is signed, request a conference with EPA's RPM and Assistant Regional Counsel to discuss this Order. If requested, the conference shall occur at EPA's regional offices at a date and time to be determined by EPA. Nothing in this Paragraph shall alter Respondent's obligation under Paragraph 58 to provide timely written notice of its intent to comply with this Order.
130. The purpose and scope of the conference shall be limited to issues involving the implementation of the response actions required by this Order and the extent to which Respondent intends to comply with this Order. This conference is not an evidentiary hearing, and does not constitute a proceeding to challenge this Order. It does not give Respondent a right to seek review of this Order, or to seek resolution of potential liability, and no official stenographic record of the conference will be made. At any conference held pursuant to Respondent's request, Respondent may appear in person or by an attorney or other representative.
131. Requests for a conference must be by telephone followed by written confirmation mailed that day to Brett Moffatt, (415) 972-3946, facsimile (415) 947-3570, U.S. EPA Region 9, 75 Hawthorne Street (ORC-3), San Francisco, CA 94105.

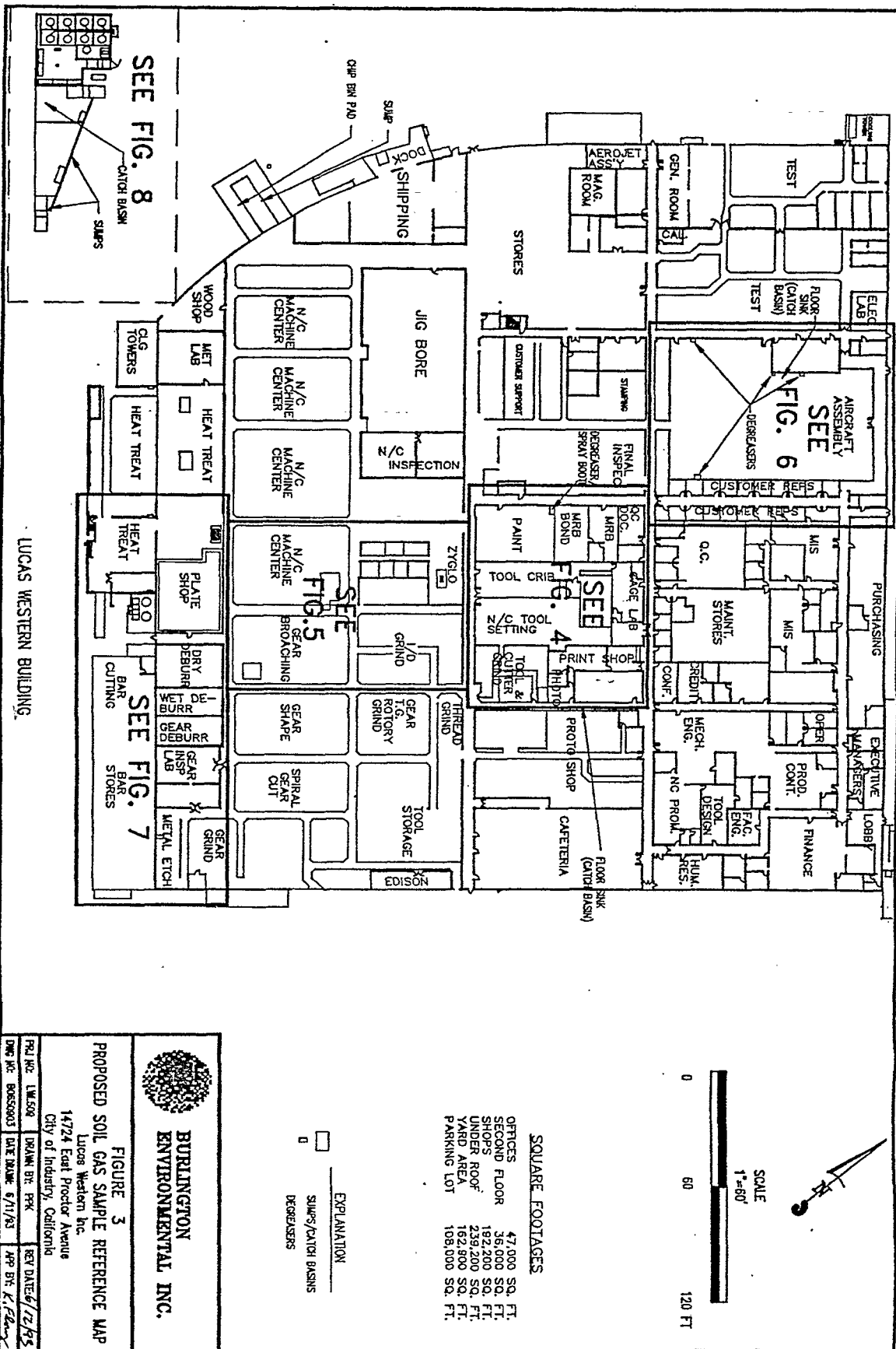
So Ordered, this 21ST day of March 2002.

BY: _____

John Kemmerer
Chief, Superfund Site Cleanup Branch
U.S. Environmental Protection Agency, Region IX



Attachment 2(a) - 200 South Turnbull Canyon Road



1A

FIGURE 2
SOIL BORING AND WELL LOCATIONS
THE MONADNOCK COMPANY

